

DESTRUCTION REVIEW

The annual destruction review project begins in November and is not fully completed until approximately April.

Every November, RIM requests each storage vendor district to produce a report showing all boxes that are eligible for destruction. The criteria for the destruction report is the destruct review date (always the last day of the current year). The report is run in record class order. RIM reviews the report for accuracy by looking at the description and record series to make sure they are correct and appropriate for the record type. In addition, RIM ensures that the record series calculated the correct destruct date for each box.

Destruction review dates for all boxes within storage are calculated via computer. An electronic listing of all record series numbers, along with their retention periods were given to each storage vendor. The vendor inputs the data into their computer system. When a box is added to their system, the computer calculates the destruct date by adding the retention period to the date range. For example, a box could have a date range of 1993 through 1994. The record series number for this box is RS45. Record series RS45 has a retention period of seven years. The computer will add seven years to the last date within the date range (1994). The destruct date will be calculated as 2001.

RIM then creates a spreadsheet (Appendix H) showing each record series number within the RRS and indicating the number of boxes eligible for destruction within each off-site storage district by each record series. Finally, RIM consolidates the numbers to one total number, along with the retention period for each record series for review by LPP and Tax. See Appendix H, for a sample of the memorandum that accompanies the destruct review lists.

LPP and Tax are requested to review and approve the listings, within two weeks, to determine whether the boxes eligible for destruction under each record series may be destroyed. If not, they need to indicate their reasons and a date range they are targeting.

Once RIM receives the review listing back from LPP and Tax, RIM sends each storage vendor their signed destruct review list, indicating any boxes that may not be destroyed or changes needed in any box data information. The vendors are requested to have all boxes destroyed within a four month period. The vendors will then send RIM a Certificate of Destruction listing the boxes that were officially destroyed. RIM places the review listings and the Certificates of Destruction in storage for a period of 15 years under record series RS153.

IMAGING SYSTEMS OR OTHER ELECTRONIC MEDIA

When implementing a new imaging system or any other type of electronic media for records the following information must be maintained.

1. A record of where, when, and on what equipment any document was imaged will be maintained.
2. Documentation on the initial system, an accurate chronological record of changes to the system. This must be maintained for as long as the system is running. Any major changes need to be discussed with the Tax department.
3. Evidence of procedures ensuring the quality, reliability and the integrity of the documents being imaged, including audit procedures.
4. A list of MCI management personnel responsible for the supervision of the system (systems and record imaging). Provide names, dates, and titles. This needs to be updated when the "players" change.
5. A description of the optical platters used for storage, and location of where back-up copies will be maintained.
6. Identify the location of records that are not or cannot be imaged.
7. Procedures for retrieving records from imaging system.

Originals of imaged documents need to be retained if the retention period is longer than 7 years. Imaging systems should be used for day-to-day use and the need for quick retrieval, not for long-term storage.

If implementing an imaging system for financial records, IRS Rev. Proc. 98-25 and 97-22 must be followed. A copy of both revenue procedures is in Appendix I.

Back-up copies of imaging platters or electronic media (CD ROM, tape, diskette, etc.) must be stored in a location separate from where they were created, are used and updated. RIM recommends that the back-ups be placed in off-site storage within a climate controlled vault. Much like tape storage, there should be a "floor copy" which is used as the working copy, and a copy used for disaster recovery. If anything happens to the "floor copy", the disaster recovery copy is pulled from storage, copied, and returned to storage.

For any new system containing records where the originals will no longer be received, it is highly recommended that LPP be consulted regarding approval of the system, and to make sure that originals are not required. If the new system involves financial records, LPP and Tax should be consulted.

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Finally, it is recommended that you speak with the Income/Franchise Group within the Tax Department to ensure that you are following all the rules, and that there is not a problem with the new system and its function.

Currently, the company has three imaging systems in place.

Needs updating.

The first imaging system is located in PCY under RIM. The system is a Viewstar imaging system implemented in 1994 for A/P vouchers. All details regarding this system are found in a binder within RIM. This system is gradually being replaced by the Filenet imaging system. This imaging system will be used on the front-end, instead of the back-end. Viewstar, which was used for back-end operation, will remain in use for historical data only. All imaging for new vouchers is done on Filenet.

The second system is located at HR Records in Denver. This system is used to image personnel records. A binder providing all details regarding this system is located in the HR Fileroom. A listing of records imaged at HR Records can be found in Appendix J; also an approval memo from LPP to retain the above records on one imaging system.

The final imaging system is Filenet, and is used for travel and expense documentation within Vendor Services located in Atlanta. A binder detailing this system is located in Vendor Services in Atlanta.

EDI data.

For EDI, a binder should be created that states how the records are received, read, processed, and retained. The binder should also state who is responsible for the records, processing the records and the overall system, along with how long the record is being retained and where.

Other Recommended Storage Medium

Microfilm and microfiche are good forms of archival media for records that need to be retained over 10 years. Tape storage is a good form of media for records that are retained less than 10 years. Tape starts to breakdown after 10 years. If the tape is used frequently, the usefulness of the tape is further reduced. CD ROM has not been tested for longevity; however, experts state that CD ROM should last 10 years depending on the amount of use it gets. Tapes and CD ROMs should be migrated to a new media form if the data is to be retained over 10 years.

RIM policy on tape rotation follows.

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-----Original Message-----

From: Vickie Lucas [mailto:Vickie.Lucas@wcom.com]
Sent: Thursday, April 05, 2001 12:37 PM
To: 'Brenda Tate'; 'Albert Talley'; 'Chicha Barnes'; 'Lisa Hayward'; 'Phil Hasselvander'
Subject: Tape Rotation Draft 'Policy'

To all,

Before delving in to the specifics of tape rotation, we should remind each other that our department is not here solely for records storage. The Records and Information department of MCI assists, oversees....the management of records and information – in any form – active/inactive – onsite/offsite. *Please* ask for a discussion on this if you feel you are not clear on it.

Is the end-user talking about tape rotation for *system* backups (see LAN below). For example, there are departments in MCI that backup their customer's systems on tape or retain their records/information on tape (or other electronic media). In other words, all of the customer's system information / or billing records / or HR records may be contained on the tapes being discussed. These are records/information and come under *all* of the record management procedures as far as retention and storage.

DRAFT POLICY RE: TAPE ROTATIONthere items that we/RIM need to discuss and decide upon, so this is may be bare bones.

Is the tape rotation for *system* backup for a LAN system or a midrange system?

- LAN: Tape rotation for system backups to a LAN is not under the prevue of the Records Management department. This involves a large volume of *systems* backup; it does not involve the backup of records/information. This type of tape rotation is each department's responsibility. RIM can advise on vendor selection and vendor monitoring, if requested.
- Midrange systems: Tape rotation for backups for a midrange system, which *do* contain records, are on a case by case basis. The end-user inquiring must submit their specific information to RIM for review and determination. *Points for our review and determination:*
 - What records are involved? Are Vital records are involved.
 - The volume of tapes.
 - Size of the department. *

* This is an item we need to discuss within RIM. The records/information contained on these midrange systems could entail Vital Records/Information. Where that pertains, the following is a decision to be made by RIM.

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A large department with a large volume of records – large volume of tape backups – can accommodate this process for their department, including costs. The premise that RIM is making these backups a requirement or a procedure does not mean that RIM must pay for it. Again, we can advise where necessary.

Small departments, with a small volume of backups (say...5, 10 tapes), again containing Vital Records - RIM should advise them of the requirement of backup. However, since the department may have not budgeted for this process, RIM could pay for the remaining of this year to allow for budget planning for following years.

This is the best I can do on a 'draft policy' prior to RIM getting together to discuss. Please submit comments on what I have put together. We should set a day/time to meet while Lisa is here next week, to discuss.

If you need explanation on LAN, midrange, etc, please ask.

Thanks,
Vickie

-----Original Message-----

From: Lisa Hayward [<mailto:lisa.hayward@wcom.com>]
Sent: Tuesday, April 10, 2001 9:20 PM
To: Chicha Barnes (E-mail); Phil Hasselvander (E-mail)
Cc: Al Talley (E-mail); Brenda Tate (E-mail); Vickie Lucas (E-mail)
Subject: Tape Rotation

Chicha and Phil,

Just to recap our meeting today, I want to make sure that you understand that you are not to give authorization for tape rotation to any group. It will be necessary that each end-user requesting tape rotation put their request in writing with all the necessary information we need in order to access RIM's role. The e-mail needs to indicate the department making the request, the department's function, why they need tape rotation, what type of information on the tape, how often do they want the rotation, how many tapes, etc., as well as the other questions that Vickie referenced in her e-mail. For the next several requests, Vickie or myself will review the requests with you, and if necessary, meet with the end-user making the request.

Chicha will be contacting the other individuals who inquired regarding tape rotation and setting up meetings with them and myself so that we may discuss their need for tape rotation. In addition, Chicha will be finding the information needed to locate the individuals that she previously authorized tape rotation for, so that we can meet with them and discuss their continued use of tape rotation under RIM's budget.

Also, once Matt Mannix lets Chicha know when it would be good to have another meeting, Chicha will set-up a conference bridge, and inform Matt and myself the date, time and number via e-mail.

If either of you have a questions regarding anything on tape rotation, please let me know.

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Vnet 939-1271
919-325-1271
<https://teamnet2.mcilink.com/departments/rim/>

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The information in this email is confidential and may be legally privileged; it is intended solely for the addressee. Access to this email by anyone else is unauthorized.
If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful.
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DECOMMISSIONING SYSTEMS

If a department is decommissioning a system, several factors need to be reviewed.

First, if the system contains financial information/data, Bob Evans in the tax department needs to be notified before the system is decommissioned. Any data contained on the decommissioned system that has a retention requirement must be retrievable and readable until it has fulfilled its retention requirement. The data does not have to be in the same format as it was on the decommissioning system; however, none of the data may be altered or changed. If the data is in a database format, the database may be saved in a flat file format, so that it may be read on any system. Documentation of the data conversion should be created to prove that it was only converted, and that the value or significance of the data had not been changed.

If data contained on a system can only be read with a particular program or hardware, the hardware or program must be retained for the life of the system, or until the retention requirement for the data has been reached.

It is not mandatory to convert data from the old system to the new system. The only requirement is that data can be found, retrieved and read in a timely manner.

An application or HLQ with data on the mainframe does not need to worry about retention of their records. Even if the HLQ is being decommissioned, the mainframe will maintain the data for its entire retention period. (See Records Retention Initiative (RRI) section.)

ACQUISITIONS, MERGERS & JOINT VENTURES

When MCI acquires or merges with another company, it is RIM's responsibility to bring the new company into compliance with the retention program. The first thing that should be done is to find out if the acquired company had a records retention program. Next, RIM needs to find out where all the financial and human resources records are located. If in storage through a vendor not utilized by MCI, RIM needs to assist in the transfer of the records to one of our vendors and then inventory the contents of each box. For both on-site records and stored records, RIM needs to ascertain what retention period, if any, was being utilized. All personnel records/human resource records need to be shipped to the HR Fileroom. Finally, familiarize each employee of the new company with the requirements of the records retention program.

If MCI buys into another company as a joint venture, and if MCI is the minority holder, we have absolutely no obligation or responsibility for the joint venture's records. However, in the past, MCI has offered their expertise in records retention to the other company (i.e., Avantel). We have given advice, but we do not participate in the retention of their records.

An Acquisition Guide was developed to issue to new acquisition personnel until they have access to RIM's website. A Questionnaire was also developed to ascertain storage practices and needs of the acquisition. Both the Guide and the Questionnaire are in Appendix K.

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RIM COMPLIANCE AUDIT PROGRAM

The RIM Compliance Audit Program is a continuous process. The purpose of the audit program is to ensure that all departments are complying with the records management procedures and retention program. One objective of the audit is to educate each department regarding the Records Management Program and their individual responsibilities.

Department are selected randomly. The auditor needs to perform background research on the department, such as what types of records the department has, if they have off-site storage, etc. An e-mail, along with a questionnaire (Appendix L) is sent to the department requesting a meeting. The questionnaire is reviewed, follow-up questions are asked and answered, and then the department is accessed for compliance.

Factors in compliance:

Is the department retaining their records in accordance with the RRS?

Is the department shredding confidential records? Does the department understand what is considered confidential?

Is the department storing their records off-site properly? Can records be retrieved in a timely and efficient manner?

Is the department destroying on-site records that have surpassed their retention?

Is the department backing-up their PCs? Does the department retain e-mail when appropriate?

Does your department enter journal entries into the ledger system? If so, what do you do with the original documentation?

There are other criteria for passing the audit; however, the most important criteria is whether or not the department is retaining records they are responsible for, and retaining them for the right period of time.

Once the department has been audited, a memorandum is created stating the results and recommendations. The memorandum should be sent to the Interviewee with a copy going to their manager. If the department passes the audit, a certificate (Appendix L) is sent along with the memorandum. Departments that pass the audit are audited every five years. If a department fails the audit, the memorandum will contain reasons for noncompliance, recommendations to become compliant, and a re-audit date.

Departments that fail are audited again after one year. See Appendix L, for a sample of a department who was not compliant with the records management program.

On a quarterly basis, a status report of the compliance audits is given to the Manager and Sr. Manager of the department. See Appendix L, for an example of the status report.

RECORDS RETENTION INITIATIVE (RRI)

The Records Retention Initiative, or RRI, was a corporate-wide project to identify, and retain electronic data critical to legacy-MCI's legal and fiduciary requirements. The project was initiated to support managing the risk associated with electronic data retention.

RIM was the major driver in the creation of the RRI. The RRI started in 1997 after RIM found that some tape data was not being retained long enough. It was determined by the Director of Finance, VP of Finance/Controller, and Director of Production Operations that a task force was necessary to review every mainframe system application high-level qualifier (HLQ) within MCI, and certify it for compliance with retention policies. The project was owned and driven by MCI's Service Operation's Production Operations Department located in Colorado Springs. It is now handled and maintained by EDS.

The RRI created a purpose and mission statement as follows:

Purpose:

The purpose of the RRI was to implement and explain the standards and management of Direct Access Storage Devices (DASD) and of magnetic tape resources on the mainframe.

Mission Statement:

The RRI will implement a process to ensure MCI's critical data is retained in accordance with government regulations and MCI Corporate Policy.

The RRI main objective has been achieved. As of now, the RRI handles new high level qualifiers (HLQs) and HLQs that are changing their process. HLQ is a two alpha letters identifying the application. You can view the standards by going to <http://eashome.mcit.com/innerstand/>

You will find specific information regarding Critical Data Set Naming and Retention located under 1.2.3.13 of the standards. This will show a list of the categories and their retention requirements as dictated by Records Management.

Records Management's role has been to determine if a HLQ has a retention requirement and, if so, what category they fall under within the standards. Records Management does not assign data set names or give direction in how it is to be done. All instructions are to be given by the RRI group within EDS. A listing of HLQs and their required retention is in Appendix M.

The RRI Committee includes:

Project Lead: Carla Adams, EDS, Vnet 622-5556

Project Coordinator: Trishell Glasco, EDS, Vnet 622-3133

Records and Retention Advisor: Records Management

INTERNAL E-MAIL POLICY

All electronic communication systems and all communication and information transmitted by, received from, or stored in these systems are the property of the Company, and as such are to be used solely for job-related purposes.

Offensive messages, such as those including racial slurs, sexual innuendo or any other type of inappropriate language, are strictly prohibited. Additionally, the e-mail network is not to be used to solicit for outside business ventures or political or religious causes.

Employees should not use this system for personal purposes. Further, employees are not permitted to use a code, access a file, or retrieve any stored communication unless authorized to do so or unless they have received prior clearance from an authorized Company representative. No employee may use a pass code that has not been issued to that employee or that is unknown to the Company.

Electronic mail communications are considered to be Company property and are subject to inspection by the Company at any time without prior notice. Employees who violate this policy are subject to disciplinary action, up to and including discharge.

As you know, MCI has in place a mandatory records retention policy developed and monitored by RIM. This policy applies to all MCI entities and establishes retention criteria, which are generally based on the nature or content of a particular document. Because e-mail encompasses the full array of types of communications, the retention period is based on the content of the message in question. Thus, for example, an e-mail message between a MCI employee and a vendor must be retained for the time period specified for vendor correspondence.

Unless otherwise covered by a specific retention requirement, internal e-mail need not be retained beyond its useful life unless it is relevant to ongoing litigation, an enforcement proceeding or an audit. Under such circumstances, you typically will be notified of the obligation to retain until further notice the pertinent hard copy and electronically stored materials.

This policy is intended to supplement, not supersede or contradict, any other e-mail policies in effect at the Company. Those policies are located at the following Intranet websites: <https://teamnet2.mcilink.com/departments/lppgc/techlaw/>

See Appendix N for a copy of LPP's "E-Mail Guidelines."

RECORDS MANAGEMENT TRAINING

Records Management training is given throughout the company. Typically, training is given when enough individuals have requested it in a particular location and can be given either via Conference Bridge or in person by RIM personnel.

Areas covered in training are:

- What is Records Management?
- What is a record and non-record?
- What are vital records?
- What is a Records Retention Schedule?
- Why can't records be saved forever?
- What is the Records Management Compliance Audit?
- E-Mail issues
- Records Management's web-site

In addition to the areas covered above, two videos are shown during the training. The first video shown is "For the Record". The second video is "The Plugged-In Mailbox; E-Mail Uses and Misuses". Both videos are by Commonwealth Films, Inc. and both are approximately 22 minutes in length.

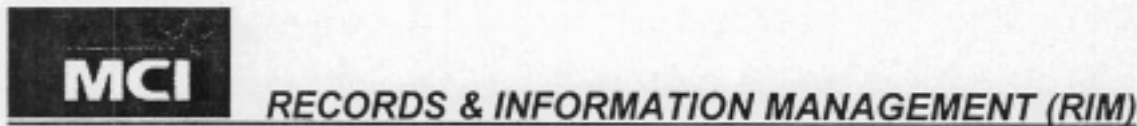
A copy of the training presentation and other records management training information is in Appendix O.

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COMMUNICATION – “NEW EMPLOYEES”

Once a month RIM receives a list of newly hired employees and sends a communication out to them. A copy of this document is available by request per Christopher Moses;

Christopher.Moses@mci.com.

**Welcome New Employee!**

The Records and Information Management group would like to welcome you to MCI. We believe that every new employee can immediately contribute to the success and continuity of our Records Program.

We have outlined the program's objectives and described employee responsibilities in the following overview. Please take a moment to read through this information.

We wish you every success in your new job!

Introduction:

Compliance with MCI's Records Program is mandatory. As an MCI employee, you are responsible for understanding the policy and complying with the program. Records management is an ongoing effort and a regular part of each employee's job.

Since the Records Program is mandatory for all employees, and all levels of management are held accountable for their department's compliance, Records and Information Management (RIM) would like to take this opportunity to familiarize you with the records guidelines. The information contained within this document will help you learn about records and their importance to MCI as well as your responsibilities for records retention.

Objectives of MCI's Records Program:

- Ensures that all local, state, federal and operational record-keeping requirements are met.
- Preserves valuable floor space and other data storage space by assigning retention period limits to records.
- Promotes the availability of information by providing required retention periods.
- Ensures orderly and efficient records life-cycle management.

What is a Record?

- A record is any recorded information created, received, used or distributed by MCI in the course of conducting business, regardless of media or other specific characteristics.
- A record may be in the form of paper, microfilm, computer tape, floppy disk, CD-ROM, microfiche, videotape, optical disks, email, PC hard drive, local area networks or other unique forms.
- Regardless of the form, only the recorded information is the actual record. The medium is used as a container for the record and therefore has no bearing on records retention requirements.
- *RIM requires that all MCI records be maintained in a manner that makes them easily and cost-effectively retrievable and readable throughout the life-cycle of the record.*

What is a Non-Record?

- Any tangible information that does not typically contain data pertaining to or originated by MCI.
- Materials typically used as reference or research tools, including such items as newspapers, periodicals, brochures, internet information and books.
- Unsolicited announcements, invitations or other materials that are not filed as evidence of office or production operations.

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- Preliminary notes that do not represent significant steps in the preparation of record documents.
- Blank forms, file and office supplies.

What is a Vital Record?

- A vital record is a record that is considered to be absolutely essential to the continuation or reconstruction of an organization. Vital records help establish the legal and financial position of MCI, and are critical to preserving the rights of the organization, its employees, customers, and stockholders.
- Departments with vital records must have a disaster recovery program in place. Periodical testing of the program with results documented is required.
- Vital records must be adequately protected from loss due to accident, fire, flood, sabotage, etc.

Record versus Non-Record:

- As defined above, the differences between a record and a non-record are clear. **A record** is required to be retained in accordance with MCI RIM policy and procedures, as it possesses significant administrative and operational value for the company. A **non-record** possesses no significant administrative or operational value to the company, and therefore **has no required retention**.

What is a Records Retention Schedule?

- A Records Retention Schedule (RRS) is a comprehensive listing for all MCI employees to determine time frames for the retention of ALL records created, received, used and distributed by MCI, regardless of media. The RRS is subject-oriented and hierarchical. It groups "like records" first by major function (Primary Classification), and then by type of record (Record Series) within that function.
- All records, regardless of media, (paper, electronic, microfilm, etc.) are the property of MCI and as such are subject to MCI RIM policies. The RRS lists the record types and how long they are required to be kept.
- The RRS is available at <https://teamnet2.mcilink.com/departments/rim/retention/index.html>.

What are the Responsibilities of Employees and Management?

- All employees and all levels of management are required to be familiar with the Records Program and to comply with its policies and procedures.
- All employees are expected to retain records in an orderly manner to facilitate a cost-effective and resource-efficient retrieval process.
- Departments with vital records must have a disaster recovery program in place.
- MCI management is required to periodically review the RRS to determine the retention period for their organization records. If a record series that matches the records within an organization cannot be located, Records and Information Management should be contacted.
- MCI management is required to test their organization's compliance with the corporate Records Program on an annual basis.

Where can I find out more information about MCI's Records Program?

Visit the Records and Information Management website at: (<https://teamnet2.mcilink.com/departments/rim/>) or call Records and Information Management.

Contacts:

- Senior Manager, Audit & Control
 - Brenda Tate
 - Vnet – 806-3538
 - brenda.tate@mci.com

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➤ Manager, Records and Information Management

- Joyce Moultry
Vnet – 806-3336
joyce.moultry@mci.com

➤ Facility Closures and Records Recovery

- Darrell Daniels
Vnet – 806-3378
darrell.daniels@mci.com

➤ Electronic Records Specialist

- Michael L. Simms
Vnet – 806-1252
michael.l.simms@mci.com

➤ Audit and Vital Records

- James Green
Vnet – 806-3364
james.green@mci.com

➤ Records Inventory and Special Projects

- Joe Stephens
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➤ Paralegal

- Charles L. McBride
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➤ Offsite Storage and Invoicing

- Philip Hasselvander
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➤ Offsite Storage and Document Retrieval

- Chris Moses
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OFF-SITE STORAGE INVENTORY DATABASE

An inventory of all off-site storage located at Iron Mountain is available on RIM's website, under "Inventory Queries". This inventory data is submitted by Iron Mountain on a weekly basis.

Currently, storage vendors other than Iron Mountain do not have the capability to FTP their inventory data to MCI TeamNet. Our other vendors could provide this information in a spreadsheet format but this would entail TeamNet's manual involvement to download this information.

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RIM'S WEB-SITE:

Records management policies, procedures and information are located on a RIM's website: <https://teamnet2.mcilink.com/departments/rim/>.

The website contains the following:

Policies & Procedures – all the policies and procedures on the records management program. Also has instructions on “how to” use off-site storage.

Record Retention – MCI's Records Retention Schedule. You can either use the RRS by a search query or in PDF format.

Inventory Queries – query pages to search database of entire off-site storage inventory.

Off-Site Storage Requests – contains all request forms to storage vendors for services. Also contains the MCI Box Inventory Form, the File-Level Inventory form and the Fax Order Form in PDF. A copy of each of these forms is in Appendix?

Points of Contact – names, addresses and telephone number of the RIM staff and all off-site storage vendors.

Vital Records – listing of records that are considered “vital” within the company.

Disaster Recovery – guidance for establishing disaster recovery procedures.

Help – frequently asked questions along with their answers.

Tidbits & Reminders – some basic reminders

infoRM contains the following:

Retrievals or Queries – contains web pages that perform a retrieval or query on financial or corporate functions.

Information – contains web pages that provide information regarding a variety of issues (i.e., a listing of MCI's applications and HLQs, a listing of departments audited under RIM's compliance audit, etc.)

See Appendix P, for screen prints of major web pages within the website.

MCI RESOURCES

Law & Public Policy (LPP)

<http://lpp.MCIIt.com>

LPP is essential in assisting records management with legal questions that might arise. LPP also authorizes destruction of records in off-site storage.

Litigation, under Anastasia Kelly, Executive VP & General Counsel, provides commercial, employment and regulatory litigation services for MCI and its affiliates. The department also handles all requests for information and documents from civil litigants and law enforcement authorities. Finally, it provides advice and educational presentations designed to protect MCI from litigation.

Records & Information Management's contact with LPP is Jeff Jacobs. The destruction review listing should be sent as an e-mail attachment marked confidential to Jeff Jacobs.

Jeff Jacobs
1133 19th Street, NW
Washington, DC 20036
Phone: Vnet 222-6605
Fax: Vnet 222-6072
E-Mail: Jeff.Jacobs@mci.com

Tax Department

<http://nml.MCIIt.com/tax/tax.htm>

Tax is essential in assisting Records Management in many financial recordkeeping requirements, whether it's IRS or State requirements.

Any issues regarding tax requirements should be addressed with Jon Thoren, whether the issue is federal or state. If he does not handle your question or matter, he will direct you to the correct contact.

Jon Thoren
Income Tax Audits & Appeals
22001 Loudoun Country Parkway
Ashburn, Virginia 20147
Phone: Vnet 806-5280 or 1-703-886-5280
E-Mail: jon.thoren@mci.com

Any issues regarding tax requirements of financial systems or decommissioning of financial systems should be addressed with Bob Evans.

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Resource Management

Resource Management is responsible for tape storage of all mainframe applications data. RIM works closely with this department for system certification under the RRI, as well as during the IRS Compliance Audit Program.

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1424/117
2424 Garden of the Gods Road
Colorado Springs, CO 80919
Phone:
E-mail:

Production Support

Production Support is a major contributor to the RRI and the certification of HLQs.

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Vnet: 622-6475
E-mail: mark.s.mancini@mci.com

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OTHER RIM RESOURCES

There are many resources that can assist with records management issues.

Association of Records Managers and Administrators, Inc. (ARMA)

13725 W. 109th Street, Suite 101

Lenexa, KS 66215

Phone: 1-800-422-2762

Fax: 913-341-3742

E-mail: hq@arma.org

http: www.arma.org/hq

ARMA International - the Association of Records Managers and Administrators, Inc. - is a not-for-profit professional association of over 10,000 records and information management professionals in the United States, Canada, and around the world.

The Mission of ARMA International is:

1. To advance records and information management as a discipline and a profession.
2. To organize and promote programs of research, education, training, and networking in the profession of records and information management.
3. To support the enhancement of professionalism of the members of ARMA International.
4. To promote cooperative endeavors with related professional groups.

It is highly recommended that you become a member of ARMA.

Association for Information and Image Management International (AIIM)

1100 Wayne Avenue, Suite 1100

Silver Spring, MD 20910

Phone: 301-587-8202

Fax: 301-587-2711

Email: aiim@aiim.org

http: www.aiim.org

AIIM is an international organization made up of people in the information management community. It is the meeting place users, vendors and solution providers come together to solve problems, present ideas, provide solutions and relationships.

Joining AIIM is not necessary; however, if emphasis continues to grow in information technology, then it would be advisable to become a member.

Records Management Listserv

The records management listserv is a great source for information and a great place to meet others within the records management field. The listserv is a place to post questions and keep in touch with what is happening throughout the world.

Records Management Program – Policies & Procedures

To join the listserv send an e-mail to: listserv@listserv.syr.edu In the body of the e-mail type the word 'subscribe'. Do not add anything else. You will get an e-mail in return asking you to confirm your subscription, along with directions on how to use the listserv

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APPENDIX A

Record Retention Schedule (RRS)

APPENDIX B

“Records Needed By LPP For Possible Litigations”

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Records Management Program – Policies & Procedures
RECORDS NEEDED BY LPP FOR POSSIBLE LITIGATIONS

900 monthly settlement records	C + 10
900 records previously designated to Records Management	C + 10
A/P bills and MCI payment	CY + 7
Account receivable and payment	CY + 7
Advertisements and marketing material considered (approved/disapproved) by MCI	S + 3
Affirmative Action Plans	S + 3
Agreement for tariff services	C + 3
Alternate Channels agent records and reports	CY + 3
ANI call detail reports for 900 services	CY + 7
ANI caller credit detail reports for 900 services	CY + 7
Annoyance Call Bureau Records	CY + 3
Applicant flow logs	CY + 3
Arbitration case files	C + 10
Benefits plan documentation (e.g. SPDs)	S + 6
Billing records of local customers	CY + 7
Branch customer file records	C + 3
Business Analysis records regarding customer contract support	CY + 3
Call detail records	CY + 7
Carrier Invoice records for lease-line services and services in support of MCI's Real Time	CY + 7
Collector's notes	CY + 7
Commission information internal/external	CY + 7
Commissions data	CY + 7
Commissions plans	S + 3
Compensation Manuals	S + 3
Contracts (any and all) with drafts and correspondence relating to contract negotiations	C + 15
Copies of checks issued by Accounts Payable.	CY + 7
Copyright registrations	T + 3
Correspondence between MCI and the government related to government contracts	C + 15
Correspondence to and from local exchange carriers.	CY + 3
Credit Write-offs	CY + 7
Credit and Collections Records including phone contacts made with debtor/customer	C + 3
Customer activity documents, correspondence and communications	CY + 3
Customer complaints and MCI responses	C + 15
Customer contract records	C + 15
Customer credits and adjustments	CY + 7
Customer data - OCIS notes (online customer note screens)	CY + 3
Customer files maintained by the branch sales units	T + 3
Customer invoices and payments	CY + 7
Customer service records	CY + 3
Documents regarding how account is established.	CY + 3

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Documents to prove lost profits damages (e.g., sales, marketing and accounting-type documents -- these can constitute summary documents)	CY + 3
E-mail of departing/reassigned employees	T + 3
EEO-1 Reports; FCC-395 Report; Vets-100 Report	C + 3
Employee benefits files	T + 30
Employee Handbooks	S + 3
Employee Monitoring Consent forms	CY + 3
Employee Survey results	AR + 3
Employment applications	CY + 3
Equipment Receipt Forms	CY + 3
Field Engineer fiber-cut repair records re: equipment replacement costs	CY + 3
Field Engineer time records for fiber-cut repairs	CY + 7
Financial documents which support MCI government contracts bids, including the business case and documents prepared by Business Development	S + 10
General statistical records for customer service calls, i.e. # of calls received on daily basis	CY + 3
HR policies and practices	S + 3
HR Open Door/Investigatory Files	T + 3
Immigration Documentation (I-9s)	T + 3
Inactive account fees	CY + 7
Installation, capacity or port availability records	C + 3
Internet Postmaster records	CY + 3
Internet related records re customer complaints on spamming or spoofing	CY + 3
IP licenses and assignments	T + 3
Letter of Agency/Authorization records	CY + 5
Litigation case files	C + 10
Manager/Supervisor desk/working employee files	T + 30
Marketing and Sales Materials	S + 3
Mass Market agent records and reports	CY + 3
Material from 'Road Shows' in which MCI executives participate	S + 3
MCI Mail records relating to complaints about spamming and spoofing	CY + 3
MCI Marketing materials	S + 3
MCI's compliance with state abandoned property laws	CY + 10
Monitoring acknowledgement forms	CY + 3
NETCAP records	CY + 3
Network reliability records, including records regarding outages and fiber-cuts	C + 1
Non-publication/non-listing records (local)	S + 3
OCIS records	CY + 3
Options documentation	CY + 3
Order entry records	CY + 3
Organizational charts or other staffing information	S + 1
Original patents	T + 20
Paid commission sales rep. files	CY + 10

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Payroll	CY + 10
Payroll Deduction Authorization	CY + 10
Performance plans	S + 1
Performance Reviews	T + 30
Personnel Action Forms relating to terminations	T + 30
Personnel files (complete)	T + 30
Policies, procedures, and business plans related to local markets	S + 1
Presentations to customers	S + 3
Prime and subcontract agreements	C + 15
Procurement records	C + 15
Product descriptions and B/D requirements (i.e. B/D Playbooks)	S + 3
Product Fulfillment packages	S + 3
Promotional Materials	S + 3
Prosecution histories relating to patents, trademarks and copyrights	T + 20
Provisioning records for loops, platforms, transport, etc.	S + 3
Purchase orders	C + 15
Real estate administration and contract records	C + 15
Records reflecting investigations performed by other MCI groups (e.g. HR)	C + 3
Records related to capacity issues or inability to provide service in a timely basis (correspondence, memos, e-mails)	CY + 3
Records related to local service trials (operational trials as well as alpha and beta testing).	CY + 5
Records showing restoration efforts	C + 1
Relocation assistance files	C + 5
Reports related to performance on government contracts	CY + 1
Resolution of billing disputes	C + 1
Resumex Documentation	CY + 3
Sales award program materials and results	S + 1
Sales commissions and bonuses	CY + 7
Sales contests	C + 3
Sales Representatives commission files	T + 1
Service order records from customers and to incumbent LEC	CY + 3
Signed agreements such as the Non-disclosure/Confidentiality Agreement	C + 15
Signed confidentiality and non-compete agreements	C + 15
Suppression records	C + 3
Switch records (processed & unprocessed), i.e. rated records and non-rated records	CY + 3
T&E documentation	CY + 7
Tariff provisions	S + 1
Telemarketing records	CY + 3
Telemarketing training materials	S + 3
Telemarketing scripts for basic service and various products	S + 3
Trademark registrations	T + 3
Trouble tickets	CY + 3
Unapplied Cash	CY + 10
Wage & Bonus documentation (Payroll)	CY + 10

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Written employee acknowledgement of receipt thereof T + 3

Customer Information, such as: C + 3

customer billing name
customer billing address
customer phone number
account number
account status (active/deactive/pending/rejected)
detailed billing information
summary billing information
calling plans
language indicator
tax status
SSN/DOB
address changes
inter/intra lata indicator
telephone number
credit card number (if applicable)
promo code(s) and history
account establishment code
install date
deactivate date
financial history (payment)
master history
cus code (if applicable)
calling card number
OCIS notes (this gives a detail of actions performed on any particular account)
FCUR
FAHT (financial history)
LOA's
PIC fee(s)
lead information (phone number, date sent, date called, term code, SSN,
sales city, application/campaign code, contact name, language indicator)
payment method

CY = calendar year

C = closed, completed or canceled

S = superseded

T = terminated

AR = annual review

APPENDIX C

RRS Merged Records

APPENDIX D

RRS Electronic Version

**To be provided to storage vendors to download to their system.
An electronic copy is with the electronic version of this
Procedures manual.**

APPENDIX E

Storage Vendor Statement of Work

and

“MCI Procedures for Vendor Off-Site Records Management and Storage”